

Edward W. Swanson SBN 159859  
SWANSON & McNAMARA LLP  
300 Montgomery Street, Suite 1100  
San Francisco, California 94104  
Telephone: (415) 477-3800  
Facsimile: (415) 477-9010

Attorneys for MEHERDAD NAMIRANIAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MEHERDAD NAMIRANIAN,

Defendant.

Case No. CR-05-70926 EMC

**STIPULATION AND ~~PROPOSED~~  
ORDER TO PERMIT TRAVEL**

**STIPULATION**

Defendant Meherdad Namiranian is on pretrial release in the above-captioned case with a requirement that he obtain permission from the Court if he wishes to travel outside of the Northern District of California. Mr. Namiranian has requested permission to travel to Houston, Texas and San Antonio, Texas, departing from California on January 18, 2006, and returning to California on January 22, 2006. The purpose of the travel is to attend Mr. Namiranian's nephew's wedding on January 21, 2006.

On January 18, Mr. Namiranian will travel with his wife to Houston, TX, where he and his wife will be picked up by his nephew, Kourosh Jahangir, and driven to San Antonio to stay at his nephew's home. They will travel by car as a family from San Antonio to Houston on January 20, 2006, and the wedding will take place in Houston on January 21, 2006. While in Houston, Mr. Namiranian and his wife will stay at the home of Ms. Namiranian's cousin. Mr. Namiranian and his wife will return to the Bay Area on January 22, 2005. United States Pretrial Services Officer Timothy Elder has approved this travel, and we will provide Mr. Elder with Mr. Namiranian's complete travel itinerary and contact information of the family members with whom Mr. Namiranian will be staying.

1 Good cause appearing therefor, and with the concurrence of Pretrial Services, Mr. Namiranian,  
2 by and through his counsel, Edward W. Swanson, and the United States, by and through its attorney,  
3 Assistant United States Attorney Robert Rees, HEREBY STIPULATE that Meherdad Namiranian may  
4 travel to Houston, Texas and San Antonio, Texas between January 18 and January 22, 2006. All other  
5 conditions of release shall remain unchanged.

6 IT IS SO STIPULATED.

7  
8 Dated: January 10, 2006

\_\_\_\_\_/s/  
Edward W. Swanson  
Swanson & McNamara LLP  
Attorney for Meherdad Namiranian

9  
10  
11  
12 Dated: January 10, 2006

\_\_\_\_\_/s/  
Robert Rees  
Assistant United States Attorney

13  
14  
15 Dated: January 10, 2006

\_\_\_\_\_/s/  
Timothy Elder  
United States Pretrial Services

16  
17  
18 **ORDER**

19 Good cause appearing therefor, and upon the stipulation of the parties and United States Pretrial  
20 Services Officer Timothy Elder, it is HEREBY ORDERED that Meherdad Namiranian may travel to  
21 Houston, Texas and San Antonio, Texas between January 18 and January 22, 2006. All other  
22 conditions of release shall remain unchanged.

23 IT IS SO ORDERED.

